

COMMONWEALTH OF PUERTO RICO
COURT OF FIRST INSTANCE
COURTHOUSE OF CAROLINA

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| EFRAÍN SUÁREZ ARCE Plaintiff Vs. HON. JOSÉ APONTE DALMAU, MAYOR, AUTONOMOUS MUNICIPALITY OF CAROLINA, AGENT JAVIER RODRÍGUEZ GUERRA AND JOHN DOE Defendants | CIVIL NUM.: [handwritten: "FDP2013-0115"] MATTER: DAMAGES [time stamp: illegible "CJ of Carolina" "2013 APR – 5 PM 4:44"] |
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COMPLAINT

TO THE HONORABLE COURT:

COMES NOW plaintiff, **Efraín Suárez Arce**, through his undersigned attorney, in order to very respectfully **state**, **allege** and **request** the following:

1. The plaintiff Efraín Suárez Arce is of age, single, a public school teacher and resident of Urbanization Sabana Gardens, Street 10 Block 6 #10, in Carolina, Puerto Rico.
2. The defendant is a municipality of Puerto Rico, with the capacity to sue and be sued.
3. On April 6, 2011, Suárez Arce was negligently detained by agent Javier Rodríguez Guerra and another agent identified as "John Doe" of the Municipal Police, in violation of all regularly performed procedure in the course of a filed complaint for abuse. This resulted in the discriminatory application of established rules and procedures and a violation of the civil rights of the plaintiff. This situation has caused and continues to cause grave injury, damages, pain and mental anguish to professor Suárez Arce, which are estimated at no less than \$250,000.00.
4. Additionally, the damages are codified in Art. 1802 and 1803 of the Civil Code of Puerto Rico, as well as section 1883 of the Federal Law of Civil Rights.
5. The Municipality of Carolina was duly notified of the occurrence of this acts and, the statute of limitations has been interrupted by letter.

WHEREFORE, it is requested that the foregoing complaint be **GRANTED**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on April 5, 2013.

Lozada, Martínez & Ramírez
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Hiram Lozada Pérez
RUA 5685

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